

**SOUTH PHOENIX MULTIMEDIA TOXICS
REDUCTION PLAN
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INTRODUCTION

In recent years the Arizona Department of Environmental Quality (ADEQ) has engaged in a wide variety of projects all with the goal of achieving toxics reductions in the South Phoenix area. As part of this endeavor, in 2002 ADEQ received monies from the U.S. Environmental Protection Agency (EPA) through the South Phoenix Multimedia Toxics Reduction (MMTR) Grant. The goal of the project was to develop targeted, cost-effective actions to decrease the level of toxic pollutants and emissions to the environment in a specified area within South Phoenix. During Phase I of this grant, EPA, ADEQ, the Arizona Department of Health Services, City of Phoenix and Maricopa County constructed an environmental profile of the area and provided this information to the South Phoenix Community Action Council (CAC). The CAC then identified the project study area and selected what it believed to be the highest priority environmental concerns for the South Phoenix community. In its final recommendations to ADEQ, the CAC concluded that reducing air pollution was of primary concern to the community, and provided a list of recommendations for reducing these toxins.

Based in part on the recommendations of the CAC, ADEQ has taken a number of steps to address toxic emissions and exposures in the study area identified by the CAC. In July 2005, ADEQ submitted the MMTR Grant Phase I Report to EPA summarizing activities that had taken place to date. The Multimedia Toxics Reduction Plan (MMTRP): 1) provides an updated summary of ADEQ's activities in reducing environmental toxins in South Phoenix; and 2) discusses recent efforts to further reduce air emissions in South Phoenix through a collaborative effort with the City of Phoenix to reduce diesel emissions from city vehicles traveling frequently in close proximity to residential areas.

INSPECTIONS, COMPLIANCE ASSISTANCE, & ENFORCEMENT

The Department has taken numerous steps to improve the efficiency and effectiveness of its compliance and enforcement programs. These efforts include: 1) providing outreach and education to help reduce the frequency of noncompliance; 2) implementing focused inspection initiatives in the South Phoenix area; 3) pursuing aggressive enforcement actions; 4) pursuing supplemental environmental projects to achieve direct benefits to the community as a result of enforcement actions; and 5) improving the effectiveness and responsiveness of agency compliance programs through adjustments to the organizational structure and function.

Compliance Assistance

The Hazardous Waste Compliance and Pollution Prevention programs are developing a state-wide radiator shop compliance initiative that will include shops in the South Phoenix area. The initiative will be comprised of outreach/education, inspections, and enforcement components to ensure that shop owners are aware of and implementing operational practices in accordance with environmental law.

In January 2006, ADEQ held five workshops on the requirements of hazardous waste reporting and compliance for small and conditionally exempt hazardous waste generators.

The workshops were very well received with a total of 225 attendees, many of which were generators from the South Phoenix area.

Inspection Initiatives

As discussed in our Phase I report, ADEQ and EPA conducted a targeted inspection sweep of all South Phoenix hazardous waste treatment, storage and disposal facilities and large quantity generators, many of which resulted in the compliance actions described below. In addition, to ensure that the environmental concerns of residents are promptly addressed, ADEQ has implemented a policy to respond to all complaints within five working days or less.

Enforcement Actions

As discussed in our Phase I report, ADEQ has taken aggressive enforcement action in an effort to reduce toxins in the South Phoenix community. Since April of 2000, ADEQ issued 31 Notices of Violation (NOVs) and/or Administrative Orders, and collected over \$375,000 in penalties from South Phoenix facilities found violating Arizona's environmental laws. Additional detail regarding these enforcement actions can be found in our Phase I report.

Supplemental Environmental Projects

ADEQ has negotiated and will continue to use supplemental environmental projects (SEPs) as a tool to more directly benefit affected communities such as South Phoenix. For example, in October 2002, Superior Special Services, now Onyx Special Services, a South Phoenix mercury recycler, agreed to pay a \$125,000 administrative penalty and implement a SEP. Completed in June 2006, the SEP provided funds and assistance to the Phoenix Union High School District, located in the South Phoenix study area, for the collection and disposal of hazardous chemicals.

Restructuring of Compliance/Enforcement Programs

The Department has created a Strategic Enforcement Unit to strengthen the Department's ability to take timely and appropriate enforcement actions. In addition, the Waste Programs Division recently completed a reorganization that places all inspections and compliance personnel within the same organizational unit to facilitate effective and coordinated compliance actions. In 2005/2006, the Hazardous Waste Program doubled the number of compliance officers on staff, enhancing our capacity to effectively monitor compliance and pursue timely and effective enforcement when necessary.

POLLUTION PREVENTION

School Bus Idling Program

As part of its children's health initiative, ADEQ established a school bus idling policy and outreach program to encourage public and private schools to reduce student and driver exposure to vehicle exhaust by limiting unnecessary idling of schools buses and other vehicles to improve the health of students and others exposed. The South Phoenix schools of Phoenix Elementary, Phoenix Union High, Murphy Elementary, and Roosevelt Elementary are participating in the bus idling program.

Green Schools

With the assistance of grant money from EPA, ADEQ has developed and sustained a very active state-wide green schools outreach program. By providing schools with the necessary information to design new schools or retrofit old schools with “green technologies” we can improve the learning environment by reducing children’s exposure to indoor and outdoor air toxins, and reduce energy, resource, and water consumption. As part of our outreach program we visit schools state-wide, including school districts in the South Phoenix area, to provide educational materials and technical assistance on how to plan, design, and construct a green school.

Environmental Management Systems (EMS)

ADEQ has been actively participating in EMS workshops, training sessions, conferences, and providing assistance in planning EMSs. ADEQ participated in five workshops in 2005 that were specifically offered to businesses in the South Phoenix area. We are also developing EMS modules to assist small to medium sized facilities in establishing an EMS. Through our efforts, we will be able to help facilities in the South Phoenix area and state-wide develop tools to comply with regulations more consistently and effectively and help identify and capitalize on environmental opportunities that go beyond compliance such as reducing their use of toxic chemicals, energy, and water and reducing waste production.

Learning Sites

ADEQ implemented a policy requiring the location of learning sites be considered when evaluating permit applications for operations regulated by ADEQ to ensure the potential health impacts to children at these sites is considered prior to making a permitting decision.

DIESEL EMISSIONS

EPA and ADEQ have been working with the City of Phoenix (City) to implement retrofits of City-owned diesel street sweepers, garbage trucks, and off-road equipment operating in the South Phoenix area. Phase II MMTR funds will be provided to the City for this project, which is anticipated to result in substantial reductions of diesel particulate, including PM_{2.5}, and other air toxics. The City is contributing substantial in-kind resources to the project, including staff and management time in identifying diesel engines suitable for retrofit and appropriate diesel exhaust reduction technologies, a request for proposals, and implementation. The City will work with EPA and ADEQ to quantify the emissions and health benefits upon completion of the project.